

I am an Aircraft Owners and Pilots Association (AOPA) member, and am in agreement with their first-pass analysis that the intent of the rule may be over-extended. The onus on independent instructors seems to be a bit over zealous. Consider revisions to the extent of recordkeeping and recurrent awareness training, which would place a burden on smaller operations and independent instructors in the field. This may lead these types of operations to cease their valuable services to the aviation community, as an unwanted outcome of this legislation.